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Attorneys for Plaintiffs  
7 RITA BALDWIN; and J.C., by and through  
his Guardian Ad Litem, RITA BALDWIN  
8

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT**  
12 **SAN JOSE DIVISION**

13 RITA BALDWIN; and J.C., by and through his  
Guardian Ad Litem, RITA BALDWIN,

14 Plaintiffs,

15 v.

16 CHARLES DANGERFIELD; JASON LARA;  
17 JOHN JEFFERSON; MIKE NELSEN; and  
DOES 1-25, inclusive,

18 Defendants.  
19

Case No. CV-06-2467 JF (HRL)

**STIPULATED REQUEST TO CONTINUE  
FURTHER CASE MANAGEMENT  
CONFERENCE/ TRIAL SETTING;  
[PROPOSED] ORDER**

1 Pursuant to Local Rule 16-2(e), Plaintiffs Rita Baldwin and J.C., by and through his  
2 guardian ad litem Rita Baldwin, and Defendants Charles Dangerfield, Jason Lara, John Jefferson,  
3 and Mike Nelsen, by and through their respective counsel of record, stipulate and agree as  
4 follows:

5 WHEREAS, on May 20, 2008, the Court set a Further Case Management  
6 Conference/Trial Setting for June 27, 2008 at 10:30 a.m.;

7 WHEREAS, on June 12, 2008, the Court granted in part and denied in part the parties'  
8 cross-motions for summary judgment;

9 WHEREAS, the parties would like additional time to engage in settlement discussions;  
10 and

11 WHEREAS, the parties have met and conferred and agree to continue the Further Case  
12 Management Conference/Trial Setting to July 11, 2008 at 10:30 a.m.;

13 THEREFORE, it is hereby stipulated and agreed by Plaintiffs and Defendants, through  
14 their respective counsel of record, as follows:

15 (1) That the June 27, 2008 Further Case Management Conference/Trial Setting be  
16 continued to July 11, 2008; and

17 (2) That the parties will file a Joint Case Management Statement on July 1, 2008  
18 reporting on the status of their settlement discussions and proposing a schedule for the remainder  
19 of the case.

20 IT IS SO STIPULATED.

21  
22 Dated: June 20, 2008

Burton, Volkmann & Schmal, LLP

23 By: /s/ Timothy J. Schmal  
24 Timothy J. Schmal

25 Attorneys for Defendant Mike Nelson,  
26 individually and in his capacity as a police  
27 officer for the City of Morgan Hill  
28

1 Dated: June 20, 2008

Deputy Attorney General  
Office Of The Attorney General  
State of California

4 By: /s/ Troy B. Overton  
Troy B. Overton

Attorneys for Defendants Charles Dangerfield,  
Jason Lara and John Jefferson

7 Dated: June 20, 2008

Mayer Brown LLP

8 By: /s/ Rena Chng  
Rena Chng

Attorneys for Plaintiffs Rita Baldwin and J.C.,  
by and through his Guardian Ad Litem, Rita  
Baldwin

12 *Filer's Attestation: Pursuant to General Order No. 45, Section X(B), Rena Chng hereby attests*  
13 *that the signatories' concurrence in the filing of this document has been obtained.*

14 **[PROPOSED] ORDER**

15 Pursuant to stipulation of the parties, the June 27, 2008 Further Case Management  
16 Conference/Trial Setting is continued to July 11, 2008.

17 **IT IS SO ORDERED.**

20 Date: 6/24/08

21   
Honorable Jeremy Fogel  
United States District Judge